

October 17, 2011

Arizona Independent Redistricting Commission  
1100 W Washington St  
Phoenix, AZ 85007

VIA FAX & U.S. MAIL

Dear Members of the Independent Redistricting Commission:

The Cochise County Board of Supervisors strongly objects to the proposed Congressional Map and proposed Legislative Map drawn by the Independent Redistricting Commission. The Board of Supervisors strongly urges the Commission to re-draw each of these maps by placing the entire County in a single Congressional District and a single Legislative District.

With respect to the Congressional Map, the IRC has created a Congressional District (District 1) that is over 500 miles in length, thereby completely ignoring the requirement for compactness and contiguity. One of the purposes of a Congressional office is to represent or advocate for individual constituent concerns. With the strong likelihood that the Congressional representative will be from the northern part of Arizona, or alternatively from Pinal County, the 7,648 residents of Cochise County in proposed District 1 will find themselves largely disenfranchised. Face-to-face meetings with Congressional staff will not occur, and it is unlikely that there will be a Congressional branch office within a reasonable distance to most of these residents. Cochise County has been well served having representatives who reside near the County. While the IRC has received input that it would be desirable to have 3 Congressmen whose districts touch the Mexican border, the reality is that border issues here are different than they are in the northern part of the State. All of Arizona has concerns about illegal immigration and its impacts. Cochise County lives those concerns each and every day, as it is a major transportation corridor for illegal immigration. It also has other issues including cultural ties to communities across the border, and commerce between the people in communities between both sides of the border. All of these issues will be better understood by a representative who is close enough to Cochise County to fully understand their complexity. The Board of Supervisors objects to the proposed dilution of voting strength

of County residents. With over 130,000 residents, Cochise County has enough voting strength to be “listened to” and has even enjoyed a branch Congressional office within the County. Please reject a plan that basically disenfranchises 7,600 residents within our County. Furthermore, this small number of people represents .1% of the total population of a Congressional District. Removal of this population from District 1 could be done so without impacting the “one person, one vote” requirements of the law.

As to the Legislative Map, the Board of Supervisors also strongly objects to a proposal which removes the City of Bisbee and the City of Douglas from the remainder of the County. The IRC has created a Legislative District that places those cities in District 2, along with Nogales and South Tucson, creating a majority-minority district that is non-competitive. While at first blush, it may seem that there is commonality between these areas, given the large Hispanic population, we assert that these communities have far more in common with the remaining areas of Cochise County than they have with South Tucson and Nogales. What the IRC has done is to separate strong “communities of interest” for the sake of grouping minority population. The entire County has unique issues regarding illegal immigration. The relationship to the Mexican border is certainly different than Nogales, and has nothing in common with South Tucson. Cochise County has unique issues that relate to large rural areas dotted with larger population centers. A single representative can better relate to these issues. Removing 29,332 persons from a County with a population of only 130,000 persons significantly reduces our opportunity to advocate on behalf of our residents. Accordingly, we strongly urge the IRC to reconsider its decision to split Cochise County into two Legislative Districts.

### **Alternatives:**

The above-stated positions are the official positions of the Cochise County Board of Supervisors. In the event, however, that the IRC chooses to ignore these concerns and implement the proposed Congressional Map and the proposed Legislative Map, we have specific concerns over the lines that have been used. Specifically stated, the new Congressional Map splits Cochise County into two parts, east and west, and the new Legislative Map splits the County into two parts, a large portion of the County and a smaller portion along the southern border. While these Maps do so using “visible boundaries,” the IRC has completely ignored County precinct lines in drawing the maps. Because Congressional and Legislative District lines require the use of “whole” precincts by the counties, Cochise County will have to re-draw over 20 precincts between the two types of districts. In a number of cases, IRC lines divide rural communities, which are already in undersized precincts. In many instances, it will be difficult to draw a new line that doesn’t create a hardship for rural residents, meaning that they would be in a new precinct that requires considerable travel in which to vote while their neighbor may be able to vote in the community’s normal polling place. It also will create multiple additional precinct parts, creating more ballot types in each precinct and increasing the possible confusion for poll workers.

If the IRC is intent upon passing the proposed version of the Congressional Map and the Legislative Map, Cochise County believes that with slight changes, the IRC intent can be

preserved and boundaries could be adjusted to more closely follow our precinct lines. Accordingly, we are enclosing 3 changes for your consideration (and have available electronically the “block” level changes using our GIS), two scenarios for the Congressional Map and one for the Legislative Map. We are enclosing the changes at the “block” level for each modification so that it would be easy for the IRC to make changes if it is so inclined. They are as follows:

### **Congressional Map:**

The IRC has split Cochise County into Congressional District 1 and 2. The eastern portion of Cochise County is placed in Congressional District 1. The IRC has stated that the rationale for this Congressional District is to have a third congressional district that touches the Mexican border, and that that district would also be a rural district, and one which is competitive. Our block level calculations show that the population of Cochise County in proposed Congressional District 1 is 7,634 out of a total district population of 710,224. Indeed, this entire eastern area of Congressional District 1 in Cochise County could be removed entirely from District 1 without impacting the 5% tolerance level for “equality” of population between Congressional Districts. If it must remain, however, Cochise County’s proposal for “minimal” modifications would be as follows:

#### **Scenario 1:**

Move the boundaries of District one eastward to coincide with 3-1/2 rural precincts in Cochise County. The new boundaries of District 1 are shown in “green” on the attachment of Scenario 1. The population change would be to reduce the Cochise County population from 7,634 to 1,480, or stated otherwise, 6154 persons would then move from your proposed Congressional District 1 into District 2. Such a change would still honor the principles established by the IRC and clearly leave the amount of Mexican border territory unchanged. If the IRC intends to move forward with the proposed Congressional map, this change to Scenario 1 is preferred.

Scenario 2: This is a minimal change scenario that simply moves the proposed Congressional line to the nearest precinct boundary line. IRC’s proposed Map creates multiple new precinct parts, even going so far as to drop down in one area to pick up 12 people who logically belong in a different precinct. Again, the revised Legislative District 1 is shown in “green” and District 2 is shown in “pink.” Under this scenario, revised District 1 would reduce in population from 7634 to 4768, meaning that 2866 persons would then be moved in Congressional District 2 (compared to your proposed Map).

In the event that the IRC wishes to proceed with the current Congressional Map, we urge that you consider these minor alternatives.

### **Legislative Map:**

The IRC has preliminarily split Cochise County into two Legislative Districts, Districts 1 and 2. District 2 basically pulls Douglas and Bisbee into a Legislative District that

includes Santa Cruz County and the southern portion of Pima County, a majority-minority district. Again the scenario we are presenting will honor that distribution, but will try to place Legislative boundaries along our precinct lines, to the extent possible. Legislative District 2 as proposed by the IRC contains 212,863 persons, 29,882 of whom reside in Cochise County. The proposed revised District 2 scenario would place a population of 32,367 persons in District 2, an increase of 2485. If that is too great a difference, the population in the area of the Douglas prison could be removed (and put back into District 1), and there would be almost no change in the population (compared to the IRC proposed version).

Finally, one more consideration: When the IRC drew the draft Congressional Map and Legislative Map, there are discrepancies along the eastern edge of the proposed Legislative Map and the southern edge of the Congressional Map. Specifically, those respective boundaries do not coincide. As a result, there would be created an area between those two lines in which there are five census blocks (1000, 1001, 10018, 10019, and 10020), which collectively have 0 persons in it. This area would cause Cochise County to have to create a new "empty" precinct. It would take little effort on the part of the IRC to match those boundaries, and we urge you do so.

In summary, the Board of Supervisors of Cochise County objects to any Congressional Map or Legislative Map that splits Cochise County and strongly requests that you reject the proposed Maps. However, if the IRC proceeds to adopt the proposed Congressional and Legislative Maps, we request that you consider the above scenarios. Please consider the hardships that the IRC redistricting process may create and work with us to establish fairer and more logical lines for each scenario. We will be sending you our GIS information electronically. Please do not hesitate to contact me for further information on this important action.

Sincerely,

Cochise County Board of Supervisors  
By: Michael J. Ortega, Cochise County Administrator

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